

EXHIBIT B

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND)
COMPOUNDING PHARMACY, INC.)
PRODUCTS LIABILITY LITIGATION)

MDL No. 2419
Master Docket No.: 1:13-md-2419-RWZ

Honorable Rya W. Zobel

THIS DOCUMENT RELATES TO:

Reed v. Ameridose, et al.
Dkt. No. 1:13-cv-12565

DECLARATION OF GEORGE NOLAN

George Nolan declares, under penalty of perjury on the date identified below, as follows:

1. I make this declaration in support of Plaintiff Wayne Reed's Motion to Set Case for Trial (the "Motion").

2. I am licensed to practice law in the State of Tennessee, and I have been so licensed since 1991.

3. I am counsel of record for the Plaintiff Wayne Reed.

4. I have observed that Wayne Reed is wheelchair bound and neurologically impaired. I understand that Mr. Reed suffers from Amyotrophic lateral sclerosis ("ALS"), also known as Lou Gehrig's disease.

5. I have observed that Wayne Reed has difficulty speaking as a result of his neurological condition. He currently speaks with much effort and can be difficult to understand.

6. I am deeply concerned that Wayne Reed's neurologic condition will deteriorate to the point that he will not be able to testify at trial. For that reason, I am requesting a prompt trial setting.

7. Presenting Wayne Reed's testimony at trial will be an important part of his case.

8. I originally filed suit on Wayne Reed's behalf on January 29, 2013 in the Circuit Court for Davidson County Tennessee (the "State Court Action"). Pursuant to Tenn. Code Ann. §§ 29-26-121 and 29-26-122, Mr. Reed, through my office, provided at least 60 days' notice before filing suit to Saint Thomas Outpatient Neurosurgical Center, LLC, John Culclasure, M.D., Debra Schamberg, R.N., Howell Allen Clinic a Professional Corporation, Saint Thomas Health, Saint Thomas Network, and Saint Thomas Hospital West f/k/a Saint Thomas Hospital ("Saint Thomas Defendants"). Wayne Reed also provided each defendant with an authorization to obtain Diana Reed's medical records from each other.

9. Wayne Reed first sent the Saint Thomas Defendants the requisite notice and medical authorizations on November 13, 2012.

10. After Plaintiff filed the State Court Action, Plaintiff and Defendants exchanged extensive written discovery. Plaintiff Wayne Reed responded to numerous discovery requests from each of the Saint Thomas Defendants between January 2013 and June 2013.

11. In June 2013, Plaintiff Wayne Reed non-suited his State Court claims in order to join the MDL. On September 12, 2013, Wayne Reed filed a Complaint in the United States District Court for the Middle District of Tennessee (Case No. 3:13-cv-00923). On October 15, 2013, Wayne Reed's case was transferred to the MDL and assigned Case No. 3:13-cv-12565.

Executed on this 22nd day of May, 2015, in Nashville, Tennessee


George Nolan